

*United States Court of Appeals
for the Second Circuit*



APPELLEE'S BRIEF

76-1583

IN THE UNITED STATES COURT OF APPEALS
FOR THE SECOND CIRCUIT

UNITED STATES OF AMERICA,

Appellee

B
MS

v.

SALVATORE RINILO,

Appellant

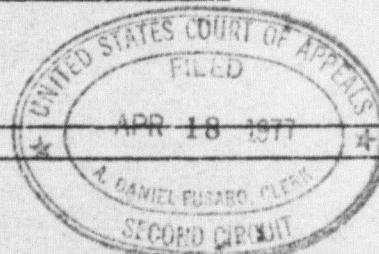
ON APPEAL FROM THE UNITED STATES DISTRICT COURT
FROM THE WESTERN DISTRICT OF NEW YORK

BRIEF FOR THE UNITED STATES

RICHARD J. ARCARA,
United States Attorney,
Western District of New York.

DENNIS P. O'KEEFE,
Special Attorney,
Buffalo Strike Force.

WILLIAM G. OTIS,
HENRY WALKER,
Attorneys,
Department of Justice,
Washington, D.C. 20530.



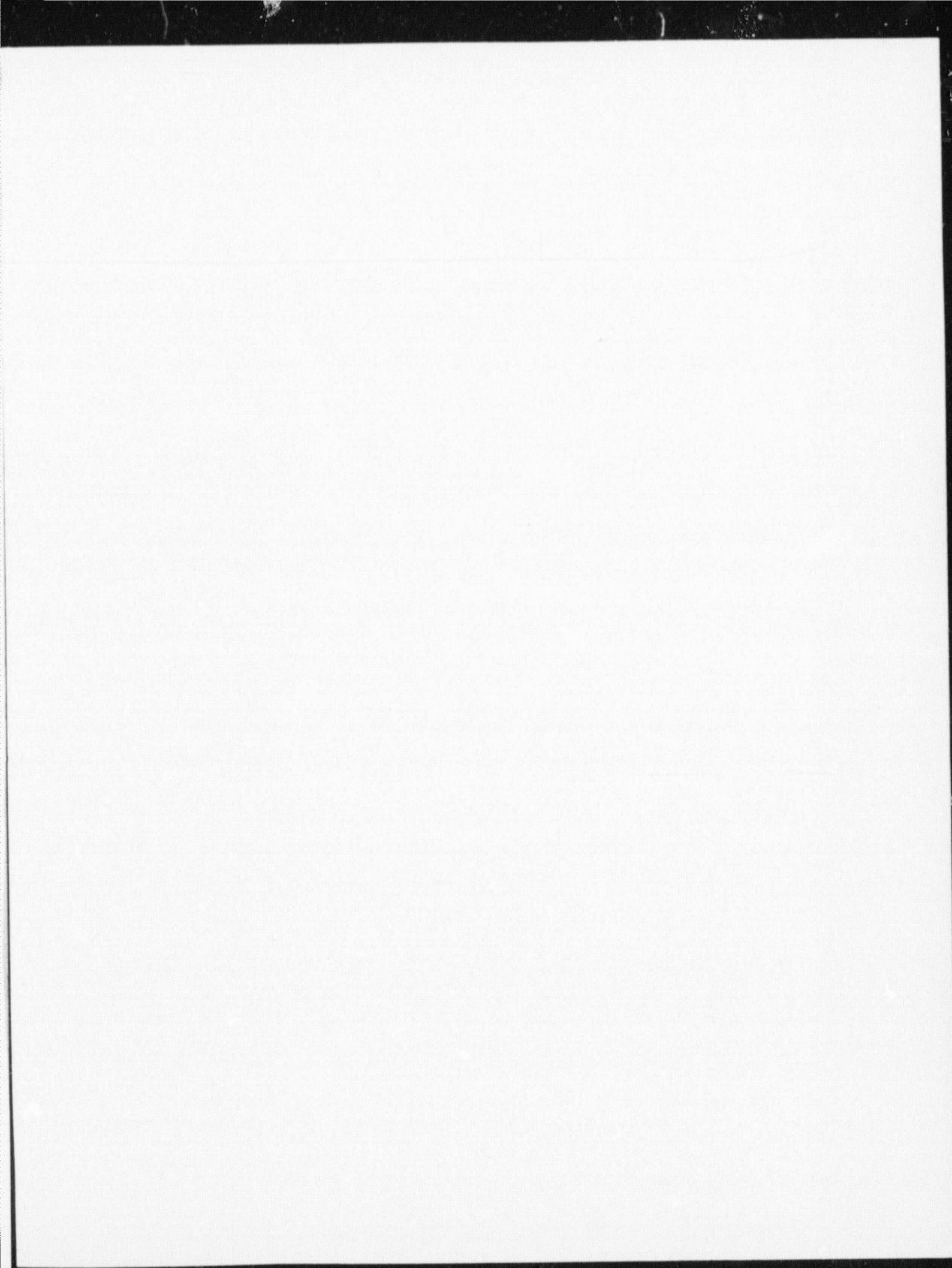
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IN THE UNITED STATES COURT OF APPEALS
FOR THE SECOND CIRCUIT

No. 76-1583

UNITED STATES OF AMERICA,
Appellee

v.

SALVATORE RINILO,
Appellant

ON APPEAL FROM THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK

BRIEF FOR THE UNITED STATES

QUESTIONS PRESENTED

1. Whether the evidence was sufficient to support the conviction.
2. Whether affidavits executed in support of two search warrants established probable cause to believe a federal crime was being committed.
3. Whether the sentence was excessive.

STATEMENT

Following a jury trial in the United States District Court for the Western District of New York, appellant was convicted of one count of conspiring to violate federal prostitution laws, in violation of 18 U.S.C. 371, 2421, 2422, 2423, and 1/ 1952. He was sentenced to two and one-half years' imprisonment.

In sum, the evidence at trial showed that appellant and 2/ codefendant Linda Ferguson operated a prostitution business in Buffalo, New York, between April 1972 and January 1974. Ferguson was the madame; appellant her pimp. The prostitutes lived either at Ferguson's apartment or in another apartment Ferguson maintained. Each girl usually stayed one week and then traveled to another location.

Our detailed review of the evidence, with record references, is set forth below under part I of our argument.

1/ Appellant was originally indicted on five counts -- four substantive offenses (Counts 2 through 5) and the conspiracy charge (Count 1). The district court dismissed Count 5 at the conclusion of the government's case (Tr. 210) and the jury acquitted appellant of the other substantive counts.

2/ Ferguson pleaded guilty to the conspiracy count and to three counts of a related Boston indictment charging conspiracy and substantive violations of the anti-prostitution statutes.

ARGUMENT

I.

THE EVIDENCE WAS SUFFICIENT TO
SUPPORT THE CONVICTION.

Appellant concedes that the evidence established the existence of a conspiracy to operate an interstate prostitution ring; that Linda Ferguson was the madame of the bordello in Buffalo, New York; that he was aware of the character of Ferguson's business; and that he had with Ferguson "a relationship of some years standing" (Br. 12, 14-15). He contends, however, that the proof was insufficient to demonstrate his participation in the conspiracy or knowledge of its interstate connections. As we now demonstrate, these claims are wholly without substance.

1. (a) Three former prostitutes who had worked in the Buffalo operation gave direct testimony that appellant was Ferguson's pimp and was actively involved in running the prostitution enterprise.

Darlene Baggetta testified (Tr. 140-153) that appellant on occasion played a personal role in the management of the business. In January 1974 -- when Baggetta was 17 years old -- Ferguson told her to live in apartment 401, 200 Niagara Street, Buffalo, which was connected to Ferguson's by a telephone extension line. When the customers called Ferguson they were directed to apartment 401 where the prostitution took place (Tr. 135-136, 151). Twice appellant visited Baggetta there, once to bring her a key (Tr. 152) and later to pick up the money that she had earned (Tr. 152). Appellant also instructed her to give

police a false name if arrested (Tr. 142).

On January 18, 1974, the Buffalo police did arrest Baggetta at apartment 401; she told them her name was "Joyce Williams." When Ferguson later appeared at the police station to take the girl home, she told Baggetta that the police "didn't want her [Ferguson] they wanted Sal," and "[a]ll she was concerned about was with Sal" (Tr. 149). Appellant then drove Baggetta from the station back to Ferguson's apartment where he and Ferguson questioned her about the arrest. Appellant told her that he and Ferguson had been "going for a good six years and that they expected a bust and that everything would be okay" (Tr. 149).

Rita Marie Burchill testified (Tr. 106-119, 127-129) that in December 1972 -- when she was 16 years old -- she was sent from a prostitute training farm in Ohio to work for Ferguson in Buffalo for one week (Tr. 107-110). Burchill's pimp, Raymond Pandelli, drove her to Buffalo at Ferguson's request (Tr. 108-109).

Burchill testified that she described the Pandelli operation to appellant and Ferguson and that both knew that she and Pandelli had driven to Buffalo from Ohio (Tr. 115-117). The witness also related two incidents illustrating the relationship between appellant and Ferguson. On one occasion, Ferguson wanted money to buy a surprise Christmas present for "Sam" (appellant's nickname). As Burchill explained (Tr. 117, 123):

During the week I had worked there, she [Ferguson] asked me if it was all right if she turned a few tricks because she wanted some

money so she could hold out on Sam, to get a Christmas present, something that he did not know about.

Q: That she was holding out some money on Sam?

A: Yes.

* * *

I remember that she said she wanted to hold some money back. She asked me if it was all right, because all the customers were mine, because, you know, it was up to me to work there that week. She wanted to know if she could have a few tricks, customers, so that she could make some money that he [appellant] didn't know about for a Christmas present to surprise him.

Bruchill also described how appellant and Ferguson reviewed together the account books of the prostitution business (Tr. 117):

That night before I left, Linda and Sam were sitting on the couch going over the books, where they keep track of everything, and when she divided it all up and took out room and board, and she told me what I had coming, and she told me that wasn't bad, and Sam said, "That is not bad for a slow week."^{3/}

A third former "employee," Flora Burkhart Majusic, testified (Tr. 72-82) that she had four week-long "bookings" as a prostitute with the Buffalo operation between April and July, 1972. Majusic said that Ferguson arranged the bookings by interstate telephone calls; that she (Majusic) traveled from

^{3/} At the end of Burchill's week, Mamie Harris, another madame who was working with Ferguson during this time (Tr. 129), arranged for Burchill to return to Pandelli who continued to use her as his prostitute (Tr. 118-119, 128). Pandelli was later convicted in connection with his prostitution operation, and his conviction was affirmed on appeal. United States v. Prince, 529 F.2d 1108 (6th Cir. 1976).

Ohio to Buffalo to work for Ferguson; and that Ferguson introduced appellant as her "old man", which Majusic understood to mean Ferguson's pimp (Tr. 79).^{4/} The witness said that appellant stayed "practically all the time" (Tr. 78) at Ferguson's apartment, which was then being used as a bordello, and that he was well aware of the financial details of the business (Tr. 78, 79; see Tr. 75).

The witness further testified that, although she had to split all her earnings -- as much as \$600 per week -- with Ferguson, the madame had no presentable clothes and, on one occasion, had to borrow money from Majusic simply to buy groceries (Tr. 80, 81). (This took place the morning after Majusic had given Ferguson \$50 in profits from one night's work, Tr. 81). Appellant, she said, drove a "big Cadillac" (Tr. 81).

(b) The evidence recounted above refutes appellant's claim that he was not shown to have been a knowing associate in the prostitution conspiracy. His own words and actions show that he was not just an associate, but the managing partner. He reviewed the books, personally collected money, instructed at least one girl on dealing with the police, and retrieved her from the police station when she was arrested. There was additional evidence that Ferguson, who managed many details of

4/ Betty Grand, a Pittsburgh madame, described several interstate telephone calls she received from Ferguson concerning the prostitution business. Grand testified that Ferguson "definitely" had an "old man" or pimp whom she frequently mentioned, and that once Ferguson referred to her pimp as "Sal" (Tr. 70, 93).

the business, returned its proceeds to appellant; she was apparently completely dependent on him for money, and twice referred him as her pimp (Tr. 70, 79). Having conceded that the existence of the conspiracy was proved, only slight evidence was needed to show appellant's participation in it.

United States v. Marrapese, 486 F.2d 918, 921 (2nd Cir. 1973), cert. den. 415 U.S. 994; see United States v. Head, 546 F.2d 6, 10 (2nd Cir. 1977). Taken as a whole and viewed in the light most favorable to the government, Glasser v. United States, 315 U.S. 60, 80 (1942); United States v. Cirillo, 468 F.2d 1233, 1238 (2nd Cir. 1972), the evidence here was more than slight; it was overwhelming.

2. Much the same evidence belies appellant's claim that he was unaware of the interstate connections of the business in which he played so prominent a part for so long. Indeed, appellant has conceded that he was at least familiar with the nature of Ferguson's business, and the evidence showed that the business involved calling similar operations in Pennsylvania (Tr. 58-61) and Ohio (Tr. 222) to bring in additional girls. One such girl, Rita Burchill, testified that she told appellant and Ferguson that she had come from Pandelli's operation in Ohio (Tr. 115-116). ^{5/}

5/ The government's evidence also included telephone bills, tapes of interstate conversations, and two notebooks found in Ferguson's apartment (government's exhibits 3 and 5). One, exhibit 3, contains the names and telephone numbers of several prostitutes and Ferguson's notes concerning their skill and reliability; most of the telephone listings are out-of-state. Exhibit 5 is a record of daily receipts which mentions a prostitute from Pittsburgh and indicates that on one occasion \$508 was given to "Sam R.". Appendix.

Beyond this direct evidence, however, it is simply inconceivable that appellant could have been Ferguson's pimp and the general manager of the business for six years and have been unaware of ^{6/} its interstate connections. Accordingly, the jury was warranted

6/ See United States v. Marquez, 424 F.2d 236 (2nd Cir. 1970) which also involved a conspiracy to violate the Travel Act (18 U.S.C. 1952). This court held that knowledge of the interstate element of the crime may be proven by purely circumstantial evidence and that "[i]n the case of leaders of a conspiracy, an inference may be drawn in a proper case that the leader is aware of his underling's out-of-state residence (citations omitted)." Id. at 239. See also United States v. Corallo, 413 F.2d 1306 (2nd Cir. 1969) holding that where "the totality of the proofs" show the defendant to be "right in the thick of things" and a "central member" of the conspiracy, his actual knowledge of the use of interstate facilities may be proven by a showing that "the particular defendant directly agreed to scheme in which it was known that the likelihood of use of interstate telephone calls was great" Id. at 1326-1327.

in concluding that appellant knew, or reasonably could have been expected to know, that interstate contacts were a part of the operation.

7/ For purposes of this argument, we have assumed that the government was required to show appellant's knowledge of interstate contacts; our view, however, is that it was not required to do so much.

While it may be that in order to convict for violations of the White Slave statutes, interstate knowledge must be shown (see Harms v. United States, 272 F.2d 478, 481 (4th Cir. 1959), cert. den., 361 U.S. 961 (1960)), a conviction for conspiracy to violate the Travel Act (18 U.S.C. 1952) requires only proof that the defendant intended to commit the underlying state offense, and not any separate intent to use an interstate facility or knowledge that such a facility was used. We base this position on the Supreme Court's recent holding in United States v. Feola, 420 U.S. 671 (1975) that the government is not required to show any greater knowledge or intent to prove a conspiracy to commit a crime than to prove the crime itself, and upon the holdings of numerous Courts of Appeals that a conviction under §1952 does not require separate knowledge of, or intent to use, interstate facilities. United States v. LeFaivre, 507 F.2d 1288, 1297 (4th Cir. 1974), cert. den. 420 U.S. 1004 (1975); United States v. Doolittle, 507 F.2d 1368, 1372 (5th Cir. 1975), affirmed en banc, 518 F.2d 500; United States v. Miller, 379 F.2d 483, 486 (7th Cir. 1967), cert. den. 389 U.S. 930; United States v. Hanon, 428 F.2d 101, 108 (8th Cir. en banc 1970), cert. den. 402 U.S. 952 (1971); United States v. Roselli, 432 F.2d 897, 890-891 (9th Cir. 1970), cert. den. 401 U.S. 924 (1971). But see, contra, the opinions of the Sixth Circuit in United States v. Barnes, 383 F.2d 287, cert. den. 389 U.S. 1040 and United States v. Prince, 529 F.2d 1108 (1976). Since appellant was convicted of conspiracy to violate, inter alia, §1952, his conviction should be affirmed irrespective of whether interstate knowledge was shown. At all events, in light of the quantity of the proof of interstate knowledge, we do not believe it is necessary in this case for the court to decide the issue.

II.

THE SEARCH WARRANTS ISSUED FOR TWO APARTMENTS
USED IN THE PROSTITUTION BUSINESS WERE
SUPPORTED BY PROBABLE CAUSE.

Appellant contends that two search warrants issued in the investigation of this case were invalid because the supporting affidavits failed to establish probable cause to believe that a federal crime had been committed. This claim was thoroughly considered and properly rejected by the district court in an opinion (App. Apx. 20-31)^{8/} upon which we essentially rely.

1. The warrants were issued on January 21, 1974, by United States Magistrate Edmund F. Maxwell, and executed the same day by federal agents who searched apartment 401 at 200 Niagara Street, Buffalo, New York, and Linda Ferguson's apartment at 829 Elmwood Avenue, also in Buffalo. The agents seized notes and records of the prostitution operation which were subsequently introduced at trial.

The warrants were based on identical affidavits executed by Special Agent Ronald Lee Hawley of the Federal Bureau of Investigation who relied upon information obtained from three informants. As set forth in the affidavit (App. Apx., 14-19), the first informant was personally known by Hawley to be a reliable source whose previous statements in connection with other prostitution cases had been consistently corroborated by F.B.I. investigations. The informant said he had been a customer of the prostitution operation for two years. Under Hawley's super-

8/ "App. Apx." denotes appellant's appendix.

vision, the informant telephoned Ferguson at 829 Elmwood Avenue on two separate occasions and each time was instructed by her to go to apartment 401 at 200 Niagara Street where the prostitution occurred. One of the prostitutes, later identified as Darlene Baggetta, told the informant that she was from Albany, New York and had previously worked as a prostitute in Boston, Massachusetts.

The second informant was Baggetta herself, identified in the affidavit as "Joyce Williams," the name she had given at the time of her arrest. Her information was reported to Agent Hawley by Detective Sergeant Dayke of the Buffalo Police Department. Baggetta gave Dayke a home address in Boston and told him that Ferguson had telephoned here there to hire her as a prostitute in Buffalo. Baggetta said she accepted the offer and took a bus to Buffalo where she met appellant and Ferguson. She identified both from police photographs and said that appellant had been present during a conversation in which Ferguson instructed her about the details of the prostitution operation (App. Apx. 15-17).

Finally, a third informant (unnamed in the affidavit but presumably Rita Burchill) said that she had been brought to Buffalo from another state in late 1972 to work as a prostitute for Linda Ferguson. The third informant also identified photographs of Ferguson and appellant, whom she said was Ferguson's pimp.

2. This information established ample probable cause to

believe that the illicit business under investigation involved interstate transportation of prostitutes and was therefore a federal offense. Indeed, appellant concedes that the information provided by Darlene Baggetta ("Joyce Williams"), if reliable, "would have provided the essential interstate element" (Br. 24). In fact, however, all the informants had first-hand knowledge of the operation and two of them, Baggetta and Burchill, said ^{9/} that they had traveled across state lines to become part of it.

There is no merit in appellant's argument (Br. 24-27) that the reliability of this information was not shown. Baggetta's statement to police was a declaration against interest (see United States v. Harris, 403 U.S. 573, 585 (1971); the information she provided dovetailed with the first informant's statement; and Baggetta herself corroborated the statement by identifying the photographs and by telephoning Ferguson from the police station. See United States v. Miley, 523 F.2d 1191, 1204 (2nd Cir. 1975). ^{10/} These indicia of reliability were, as the district

^{9/} The magistrate was also entitled to consider that a prostitution operation in Buffalo, New York, located near the state border, would involve interstate transportation or the use of interstate facilities. See United States v. Burke, 467 F.2d 247, 249 (2nd Cir. 1972) holding that geographic location is an element to be taken into account in proving that defendants have knowledge of the use of interstate communications, although location alone is insufficient to prove such knowledge beyond a reasonable doubt. Of course, a finding of probable cause does not require proof beyond a reasonable doubt, but only a probability that a federal crime has been committed. Beck v. Ohio, 397 U.S. 89 (1964).

^{10/}The fact that Baggetta later said she had gone from Boston to Albany, where Ferguson called her, and then to Buffalo does not retroactively undermine the magistrate's finding of probable cause. United States v. Sultan, 463 F.2d 1066, 1070 (2nd Cir. 1972).

court noted, "sufficient to establish a basis for crediting
^{11/} the report of Source II [Baggetta]" (App. Apx. 26). The statement provided by Source III (presumably Burchill) was, likewise, a declaration against interest and (as shown in the affidavit (App. Apx. 18)), related the same facts to which the source had previously sworn before a grand jury. See James v. United States, 416 F.2d 467, 473 (5th Cir. 1969), certiorari denied 397 U.S. 907 (1970). She knew Ferguson's address, identified photographs of appellant and Ferguson, and based her statements on first-hand conversations and observations. Although her information was one year old, it was corroborated by the more recent statements of the other informants and by independent investigation.

In short, the affidavits set forth the underlying circumstances in which the informants gathered their information plus corroborating facts showing that the informants were reliable. See Spinelli v. United States, 393 U.S. 410 (1969); Aguilar v. Texas, 378 U.S. 108 (1964). The magistrate and the district court were therefore correct in agreeing that the affidavits made out probable cause to believe a federal crime was being committed,

^{11/}The information was not any less reliable because it was given to Hawley by a local police officer rather than Baggetta; law enforcement officers are presumed to be reliable sources of information, and appellant has suggested nothing to undermine that presumption here. See United States v. Fiorella, 468 F.2d 688, 691 (2nd Cir. 1972); United States v. Dzialak, 441 F.2d 212, 216 (2nd Cir. 1971).

and the warrants issued on the basis of those affidavits were, accordingly, valid.

III.

APPELLANT'S SENTENCE WAS NOT EXCESSIVE.

Appellant lastly contends that his sentence of two and one-half years' imprisonment was excessive. The statutory maximum, however, is five years' imprisonment and a \$10,000 fine (18 U.S.C. 371). The Supreme Court "has recently reaffirmed the 'general proposition that once it is determined that a sentence is within the limitations set forth in the statute under which it is imposed, appellate review is at an end.' Dorszynski v. United States, 418 U.S. 424 ... (1974)." United States v. Seijo, 537 F.2d 694, 700 (2nd Cir. 1976). Since appellant makes no showing either that the sentencing court relied upon constitutionally impermissible factors or upon material inaccuracies^{12/} (see United States v. Glazer, 532 F.2d 224, 231 (2nd Cir. 1976), there is

^{12/}Appellant's primary complaint is that the district judge sentenced him on an unfounded assumption that his prostitution business was involved with organized crime.

While it drew no conclusions, the court pointed out that appellant's business flourished openly for six years without any apparent response from the local police, and that despite the large amounts of money received by appellant and Ferguson, both claimed to have none. The court remarked that "judges ought not to close their eyes to things that all other people can see and understand," and suggested the possibility that "an organization exists with respect to this business" (Sen. Tr. 25-26).

Appellant to the contrary, this was not a statement that he was a figure in organized crime, nor did it imply anything beyond what the evidence had already shown. Two of the prostitutes had been brought to Buffalo from similar and apparently cooperative businesses in other states; one had been "trained" in Ohio. The Buffalo operation was, indeed, an organization unto itself, complete with sets of books and with records noting the skill and reliability of the employees. See note 5, supra.

no occasion to disturb the sentence imposed by that court.

CONCLUSION

For the foregoing reasons it is respectfully submitted that appellant's conviction should be affirmed.

RICHARD J. ARCARA,
United States Attorney,
Western District of New York.

DENNIS P. O'KEEFE,
Special Attorney,
Buffalo Strike Force.

WILLIAM G. OTIS,
HENRY WALKER,
Attorneys,
Department of Justice,
Washington, D.C. 20530.

12/(CONT'D)

Finally, whatever may have been the import of the court's reference to "an organization", the sentence here was fully justified by the offense. Appellant was a central figure, if not the central figure, in a conspiracy lasting "a good six years" (Tr. 149) and involving the prostitution of teenage children.

47/117
CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing for the United States have this day been mailed to counsel for Appellant listed below:

Philip B. Abramowitz
815 Liberty Bank Building
Buffalo, New York 14202

DATED:

April 18, 1977

Henry Walker
HENRY WALKER
Attorney
Appellate Section
Criminal Division
Department of Justice
Washington, D.C. 20530

A P P E N D I X

Linda Ferguson
and

1/21/74

Wells



shown
By Jim Beaver
Prod & written
87c

BOO

BOO

St. Regis

NIFTY



SECRETARIAL
GREEN TINT PAPER
EASEL NOTEBOOK **39¢**

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No. 5389

A-1

Honey,

I went down town
for I just thought I'd
get an early start.

Maybe latter we can
take a ride some
where.

Love ya Baby - here's a
few kiss to remind
you. XXXXX

Your Lover Always
Linda

Come down and get me!

73

* ~~Jessica Dona~~ - 88-1-5108 good worker
not to pretty - late twenty
5'8" Light hair.

~~Ellion~~ ^{no good} 617-734-6071 - CHEAT
no repeats - pretty girl -
5'8" BLACK HAIR - 19 years old

Shelly - 412-441-8546 - OK! ! N. Repeat
Dorogatti - 412-751-2386 ^{5'7" blonde} 3 AN. 6-13-

~~Tall~~
Jan & Jimmy ¹¹⁰
¹¹⁷

~~OK~~ Nata - 412-362-2781 ^{good} Connection
- 441 - 0525

* ~~James~~ - 717-825-6770 ^{no good}

~~Terry~~ - 518-465-6446 N.D.

Brandi - 412-363-1852

Debby 518-462-6156
5'9" - L. Brown hair - 140.

* Vickey - Messy Repeater. Best worker
had 27 yrs old. Great person.
average height Brown hair - good
looking. No complaints.
314-328-4918 Conne

Very Good worker - Harold's Woman
 from Albany. with tips (850)
 Jerry Sat Nov 1

don
 534020

Sat	Buffab Bob Andy	30 50 85	15 00 25 00 40 - 3 Rent 10
Sun.	Tom Sweene 40 Joe 20 old Joe 25 Wally 30	20 10 12 50 15 00	57 50 (57.50)
Mon	Hal 25 old Joe 20 Milt 30 Don C 40 Walter 25 Sam K 20	25 20 30 40 25 20	160 (80.00)
Tues.	Big Frank 30 Frank 30 Buffab-B-B 30 Johnny 25 Lee Johnson 30 Tony B. 30 Alax 25	30 30 30 25 30 30 25	200 - 100-10 (90.00)
Wed.	Jim 60 John 25 125	60 25 125	62 50-20- (42.50)

in. x 5 3/4 in.

0007 U.S.A.

Thur E. J. 20 10
Bob ~~20~~ ~~20~~
Jess ~~20~~ ~~12.50~~
~~6.50~~ ~~25.50~~

85.50

Friday Jack 20 10.00
Pete 25 12.50
Steve ~~25~~ ~~12.50~~
~~1.3~~ ~~35.00~~

35.50

Sat. 10 Crayy Dick - 30.00 - 15
Hun Frank - 30.00 - 15
Hall - 35.00 - 17.50
Dinny - 40.00 - 20.00
135.00 - 67.50

67.50

85 50

120

(35 50)

67.50

100 50 0

Took
10
30

100

21	
10	00
57	50
80	00
90	00
42	50
25	00
35	00

Saturday 67.50
407.50

Big Frank

STANISLAW BUROWICZ
5'6" SHORT

Jan 27, 1917

140

Jan

Mon

Red
Sport
Jacket

	4	0	8
130 M. P. A. 717	2	5	
30 8239244	0	0	
717-333-49/3	8	0	
185 36	1	5	
Red Sport Jacket	6	2	8
	1	9	0
	4	3	8

Friday

Joe - about
6" Italian
about 50% caucasian
fat - belly - ruff

628

Weds

Chas 798 2400
798 1327 medium
Jew Bottoms
6'4" - thin
black hair
about 50%

Friday

W. Lee 852 8728
about 55
tall 6'11" gray hair
Black Rim glasses

30

1/14
Friday

N. Lee - nice figure

(408) Last winter - 5'3" - black hair pottery
 speaks with accent, good
 worker.

c2

4 0 8
 2 5
 1 0 0
 8 0
 1 5
6 2 8
 - 1 9 0
 4 3 8

	Sum	20	20	408
Mon.	Stanley - 30 - 15.00	<u>20</u>	<u>20</u>	
	7/28/55 - <u>20</u> - <u>10.00</u>	(50)	25.00	4 0 8
	Norm Do - 50 - 25.00			2 5
	John Tobin - 35 - 17.50			1 0 0
	Little Joe - 25 - 12.50			8 0
	Wally - 30 - 15.00			1 5
	Danny - 40 - 20.00			5 3
	Al West - <u>20</u> - <u>10.00</u>			<u>6 8 1</u>
	(200) 100.00			
Wednesday	Bill 30 - 15.00			
	Mary 25 - 12.50			
	CHUCK 30 - 15.00			
	Friend 25 - 12.50			
	Friend 25 - 12.50			
	Andy 25 - <u>12.50</u>			
	160 (80.00)			
Friday	Jerry 30 - <u>15.00</u>			
	White 20 - 10.00			
	Big FRANK 30 - 15.00			
	Friend 30 - 15.00			
	Old Joe 25 - <u>12.50</u>			
	105 .52.50			

30

figure

me - Nov - 17, 1973

Sat - Hal 25 - 25 25
Tom Dwyer 40^{10¹⁵} - 30 40 - 10.00 ^{Bill}

11

The
70

HAROLD's woman - 5'5" Light hair - one of
the best. Everyone loved
her.

Debby -

- 11 duck bags
pounds

3

25
40 - 10.00 ^{balls}

	Mon.	Joe - 20 Eldest - 20	10.00 change
	Tues.	Tom Sweeney - 40.00 20.00 Steve - 25.00 12.50 Mell - 30.00 15.00 Charlie - 10.00 5.00 HAL - 25.00 12.50	10.00
			130.00 65.00 Spent
	Weds.	Joe - Crazy Dick - 50 - 25.00 Don C. - 50 - 25.00 Bob L. - 20 - 10.00 Big Frank - 30 - 15.00 Stanley - 30 - 15.00 Jim L. - 30 - 15.00 Sam K. - 20 - 10.00 Old Joe - 25 - 12.50 DANNY - 60 - 30.00	
			315 157.50
	Thursday	Keith - 30 15.00	
	Frid.	Jack - 29 14.50 Peter - 20 10.00 Frank - 40 20.00 Tom D - 50 25.00 Pete - 25 12.50 old Joe - 25 12.50 Dave L - 120 60.00	
		339 179.50	

Bal. Hal - 25 - 12.50 12 50

John - 25 - 12.50
+5.00
30.00

Little Al 25 - 12.50
Danny 70 - 35.00
77.50

~~35.00~~
~~70.00~~

15.00 mistake

67 50
157.50
179.50
~~200.50~~
23 50

157 50
179 50
~~200 50~~
\$390.50

157.50
179.50
337.00
77.50
414.50

157.50
179.50
337.00
30.00
367.00
- 50.00
317.00

Petty - But you have to keep at
her or she lets her self go.

Linda no repeats. Funny girl - FLAKE
Mates woman Pittsburg

12 50

67 50
157 50
179 50
~~245 50~~
23 50

157 50
179 50
~~23 50~~
\$390.50

Sunday - Tom Devney

Joe 20 30
Wally 30 10
Laelanade 30 15
~~30 15~~
~~30 55~~
~~30 25~~

Monday Pete -

Johnny 20 - 10
Cray Little 20 - 10
Pete 30 - 15
40 - 20
170 - 55

Tues.

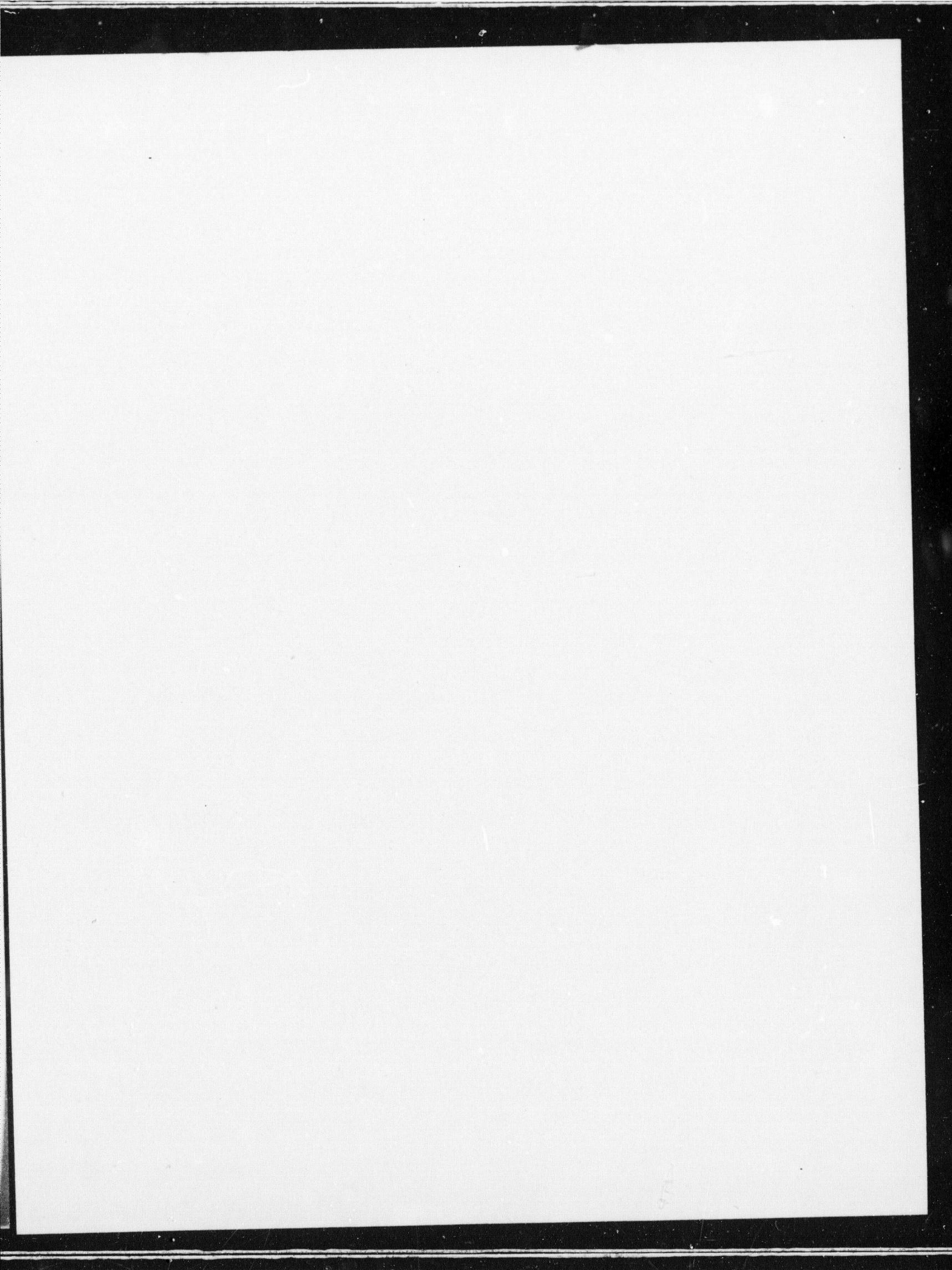
Sarge
Stan
Sam R
Lee Johnson

20 - 10.00
30 - 15.00
20 - 10.00
30 - 15.00
100 50.00

Weds.

Big Farke
Norm M
Mell
Walt

30 - 15.00
50 - 25.00
30 - 15.00
35 - 18.50
145 72.50



✓ 11 - running worn working - like
December don't touch me here
Sun. 2 ~~1982~~ - there

Tom	30-	15.00
Blind	30-	15.00
Tod	25-	12.50
Steve	25-	12.50
Joe	<u>20</u>	<u>10.00</u>
	13A	65.00

~~25.00~~ - Rent
~~40.00~~

-15.00 stock

200.	25.00
Mon.	
	Norm - 50.00 - 25.00
	Dick X - 40.00 - 20.00
	Joe T. - 40.00 - 20.00
	John - 25.00 - 12.50
	Maydwell - 25.00 - 12.50
	180.00 <u>90.00</u>

Gus	Jack J.	20.00	-	10.00
orred	Peter J.	30.00	-	15.00
	Stan	30.00	-	15.00
	L. Al	<u>25.00</u>	-	<u>12.50</u>
		105.00		52.50

~~8419000-3-1~~
~~20518145551212/535 main st,~~

Wans. Jerry -	$40 - 20$	\$ 25	00
Paul -	$20 - 10$	m 90	00
Jim =	$30 - 15$	752	50
Andy -	<u>$20 - 10$</u>	55	00
	<u>$110 - 55$</u>	157	50

Thurs. 3.00

Jack W.	- 50	- 25.00
Hal	- 25	- 2.50
Stan	- 30	- 15.00
Keith	- 30	<u>15.00</u>
	<u>135</u>	<u>67.50</u>
		10.00 off
		5.00

Friday	LED		
Dave	120	-	60
old fire	25	-	12.50
P. Bob	30	-	15.00
	175		87.50

Sat	Bud -	20	-	10.00
	Hart -	30	-	<u>15.00</u>
				25.00
				<u>10.00</u>
		<u>20</u>		<u>35.00</u>
		<u>78</u>		

Joey's 53
BUF

537 MAIN STREET
BUFFALO, N.Y. 14203
852-5629

~~Mens Shop~~

274

A 10701

ADDRESS.

REFUNDED GOODS MUST BE ACCOMPANIED
BY ABSOLUTELY NO CASH REFUNDS

ABSOLUTELY NO CASH REFUNDS
2020 E. MAIN ST. FORMA, W. Va. LEWISBURG, PA.

FORMS. 444

Din -
I owe you 105 Linda Huber
to Sam Rinck

3
80 Beneficial
48
8 ~~juke~~
188 telephone
98 a.m.a.
70 car

470 98 am. a¹⁵

60 98 a.m.a¹

14

4

48

9

40

33 1

70

411

For Lucy
Russell 2

Boys 3 4 size 29
July 14

Boys
check